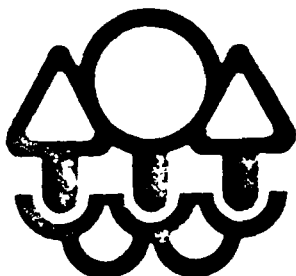




469803



Minnesota Pollution Control Agency

Aug 2, 1983

Mr. Donald J. Thimsen, P.E.
Manager, Environmental Engineering
Engineering Policy
General Mills, Incorporated
P.O. Box 1113
Minneapolis, Minnesota 55440

Dear Mr. Thimsen:

This letter is written in response to General Mills, Inc.'s June 10, 1983 submittal entitled, "Site Characterization Study and Remedial Action Plan", for the solvent disposal site located on the Henkel property in Minneapolis, Minnesota. The purpose of this letter is to provide you with the Minnesota Pollution Control Agency's (MPCA's) staffs comments pursuant to the subject report as summarized in our meeting of July 12, 1983.

Richard Ferguson and I, after reviewing the proposed remedial action plan feel that the removal of only 85 percent of the solvents that are distributed in the soils around the disposal site is not sufficient to protect the ground water quality of the shallow bedrock aquifers. Therefore, if General Mills, Inc., wishes to pursue further a program involving the excavation of contaminated soils, it is Rick's and my position that a groundwater pump-out system will also be necessary.

The justification for a groundwater pump-out system is based upon the high concentration levels of contaminants detected to the south and and southeast of the disposal site in the Platteville Formation.

During the meeting of July 12, 1983 you indicated that since the publication of the proposed remedial action plan, General Mills, Inc., was also evaluating a second alternative for cleaning up the site involving a system designed to flush the area of contamination with potable water and to collect the infiltrated water using a groundwater pump-out system.

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Mr. Donald J. Thimsen

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Such a system if designed properly could be part of an effective remedial action program. The flushing system should be designed in to flush an equal or greater mass of contamination that would have been removed by excavation.

Independent of the remedial action program ultimately recommended by General Mills, Inc., for implementation, the MPCA staff feels it will be necessary to evaluate the extent of contamination in the Platteville Formation and to determine if the St. Peter Sandstone has been impacted. Knowledge of design and the extent of contamination will enable General Mills, Inc., to purpose an adequate long-term groundwater monitoring system. The purpose of the long-term groundwater monitoring system will be to assess the effectiveness of the remedial program, detect any future migration of contaminants into deeper aquifers and determine if there is a need for modifications to the ground water pump out system operation.

The last item to be discussed at our meeting of July 12, 1983, concerned the need to finalize the conditions set forth in a remedial action plan in an enforceable document (i.e., a Response Order by Consent). For your information and review I have enclosed a copy of two separate Consent Orders negotiated with 3M Company and FMC Corporation as examples of the type of document the MPCA would require General Mills, Inc., to entire into prior to the implementation of the remedial action plan.

The final topic I would like to discuss at this time, concerns the reassignment of MPCA staff to this project. Unfortunately, because of my increased work load and additional demands placed upon me, it has been decided that in the interest of General Mills, Inc., and continued progress toward clean-up of the disposal site that I will relinquish my position of project coordinator to Mr. Edward Meyer. Mr. Meyer is an extremely competent individual and will work with Mr. Richard Ferguson who will remain as the technical advisor on this project. I will assist Mr. Meyer in a limited capacity until such time he is comfortable with the historical background and current status of the site.

In closing, I would like to thank General Mills, Inc., especially Mr. William Haun and yourself for the continued cooperation and dedication you have shown in investigating and attempting to resolve the subject contamination problem. If you should have any questions concerning the matters addressed within this letter, please feel free to contact Richard Ferguson (612/296-7717) or Edward Meyer (612/296-7746) at your convenience.

Sincerely,

Michael B. Ayers
Responsible Party Unit
Site Response Section
Division of Solid and Hazardous Waste

MBA:met

Enclosures

cc: J. William Haun, P.E., Vice President, General Mills, Inc.
✓ Kenneth D. Ohm, Associate Counsel, General Mills, Inc.
✓ Dennis J. Vaughn, P.E., Corporate Manager, Henkel Corporation

bcc: Richard Fergusson
Edward Meyer